

California Regional Water Quality Control Board North Coast Region

William R. Massey, Chairman



Arnold Schwarzenegger Governor

Linda S. Adams
Secretary for
Environmental Protection

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July 26, 2006

Ms. Dorothy Rice, Deputy Director Site Mitigation and Brownfields Reuse Program Department of Toxic Substances Control P.O. Box 806 Sacramento, CA 95812-0806

Dear Ms. Rice:

Subject:

Georgia Pacific Corporation - Former Sawmill Site, 90 West Redwood

Avenue, Fort Bragg, Mendocino County

The North Coast Regional Water Quality Control Board has been overseeing the investigation and cleanup of the former Georgia-Pacific sawmill site in Fort Bragg since the summer of 2003. The oversight began when Georgia-Pacific presented information from a Phase I Environmental Assessment conducted as a preliminary activity for sale of the property, as the sawmill had been closed since November of 2002. Ongoing investigative and remedial activities have been conducted since 2003. Recent information resulting from our oversight directives now makes it advisable to re-assess lead agency oversight of this facility.

The sawmill first began operations in 1885, ultimately covering 445 acres west of Highway 1 along the Pacific Ocean. The investigation to date has been conducted in phases, given the size of the site and the varied potential contaminants of concern which could have been generated over the lengthy historical operations. The early investigative reports indicated that the most widespread contamination was related to petroleum products, and liquid phase hydrocarbons are present in groundwater in one area of the site.

Investigations have assessed volatile organic compounds (VOCs), semi-volatile organic compounds, polynuclear aromatic hydrocarbons, metals, dioxins, and other contaminants. Petroleum products and VOCs including methyl tert-butyl ether (MTBE) have been reported in groundwater. The information and data being gathered has been widely disseminated to the public, and their review of information has been facilitated through comprehensive document postings on a NCRWQCB web site devoted to the

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Georgia-Pacific site (http://www.waterboards.ca.gov/northcoast/geninfo/gp/gp.html) as well as on the Geotracker web database (Global ID is T0604591192).

One June 13, 2006, I issued an Order to Georgia-Pacific under Section 13267 of the California Water Code. That Order was issued because preliminary data from chlorinated dibenzo-dioxin/furan analyses of samples from an ash stockpile and pond sediments were of concern. Additional documents were required, including complete sampling reports, a Public Participation Plan and a workplan regarding offsite ash disposal. In response to that Order, Georgia Pacific submitted a document on July 14, 2006, titled *Dioxin Sampling and Analysis Report*. This report contained results from recent field sampling events, and the new information reveals elevated levels of polychlorinated dibenzodioxins and polychlorinated dibenzofurans at several locations.

The new information combined with data gathered over the past three years indicates that issues related to human health exposure need to be addressed at this site. The oversight Agency Selection Guidelines of the *Memorandum of Agreement on Oversight of Investigation and Cleanup Activities at Brownfield Sites* states that the Department of Toxics Substances Control should be the oversight agency if the primary concern is the risk posed to human health. Although this site is not considered a brownfields area, and water quality issues remain, our agency considers that the human health issues would be best addressed by your agency as the primary concern at this site. Accordingly, we request that the Department of Toxic Substances Control assume the role of lead oversight agency for the Georgia-Pacific Site in Fort Bragg. The NCRWQCB would continue to participate in the review of materials to ensure protection of water quality and would provide input to the Department as the site investigation and cleanup continues.

The recent dioxin report can be found in its entirety on our web site at http://www.waterboards.ca.gov/northcoast/geninfo/gp/gp.html, along with all our correspondence since 2004. Our files are also available to you as well as the public, and we will work with you to make this transition as smooth as possible for your agency, Georgia Pacific, and the public. Please call me or Luis Rivera at (707)576-2220 if you have any questions.

Sincerely,

Catherine Kuhlman Executive Officer

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cc Ms. Beth Jines, State Water Resources Control Board

California Environmental Protection Agency

- Ms. Linda Ruffing, City Manager, City of Fort Bragg, 416 N. Franklin Street, Fort Bragg, CA 95437
- Ms. Julie P. Raming, Georgia-Pacific Corporation, P.O. Box 105605 Atlanta, GA 30348-5605
- Mr. Michael Acton, Acton Mickelson Environmental, Inc., 5175 Hillsdale Circle, Suite 100, El Dorado Hills, CA 95762
- Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue, Fort Bragg, CA 95437
- Mendocino County Health Department, 501 Low Gap Road, Room 1326, Ukiah, CA 95482
- Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA 95437
- Ms. Barbara Cook, Department of Toxic Substances Control, 700 Heinz Avenue, Suite 100, Berkeley, CA 94710
- Mr. David L. Berry, Department of Toxic Substances Control, P.O. Box 806, Sacramento, CA 95812

E-mail cc list